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May 10, 2022

Via ECF (per the Court's individual rules)

Hon. Steven L. Tiscione, U.S.M.J.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Sebastiani v. Lee*
Docket No. 19-cv-03638 (RPK)(ST)

Sebastiani v. The Brooklyn Hospital Center, et al.
Docket No. 19-cv-0253 (EK)(ST)

Honorable Sir:

Please be respectfully reminded that our firm represents Defendant Pik Lee herein. We respectfully submit this correspondence on behalf of all Defendants herein and in response to Plaintiff's counsel's latest submission (DE# 131) and in further support of Defendants' request (DE# 130) to amend Your Honor's minute orders on May 2, 2022 (DE# 129 in the *Sebastiani v. The Brooklyn Hospital Center* matter and DE# 35 in the *Sebastiani v. Lee* matter).

As was discussed during our conferences on April 12, 2022 and April 27, 2022, one of the conditions Defendants' sought to impose on Plaintiff's counsels' withdrawal from these two cases is that each of them remain subject to the Court's jurisdiction in the event Defendants seek sanctions against either (or both) of them at some point in the future. As they did during both of those conferences, Plaintiff's attorneys again agree that they "are ALWAYS subject to the Court's jurisdiction for our conduct". (DE# 131)(emphasis in original).

Since the parties are apparently all in agreement, it is respectfully requested that the Court amend its May 2, 2022 minute orders in the above-referenced actions be amended to add an additional sentence as follows: "After Turkel and Ranni are terminated as attorneys of record, they will remain subject to the Court's jurisdiction for their conduct in the event that any Defendant moves for sanctions against them."



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To: Hon. Steven L. Tiscione, U.S.M.J.

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Particularly given that this language tracks that set forth in Mr. Ranni's latest submission, it is respectfully submitted this matter is easily resolved to the satisfaction of all parties (and without the necessity of further judicial attention) by amending the two minute orders accordingly.

Thank you for Your Honor's attention to this matter. Should the Court have any questions regarding any of the above or require anything further, please do not hesitate to contact the undersigned.

Respectfully Yours,

/s/

Matthew J. Walters

Cc: All Parties (via ECF).

Encl.